



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

HANNAH V. FADDIS
Senior Counsel
Phone: (212) 356-2486
Fax: (212) 356-1148
hfaddis@law.nyc.gov

December 22, 2022

VIA ECF

Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 11201

The motion to seal is granted. The Clerk of Court is directed to seal Docket Entries Nos. 100-10 and 121-8, which shall only be viewable by Plaintiff Nakia Taylor, Defendant The City of New York, and Defendant Lieutenant Christopher Siani.

SO ORDERED.

/s/ Alvin K. Hellerstein, U.S.D.J.
January 4, 2023

Re: Nakia Taylor v. City of New York, et al.,
18-CV-8421 (AKH)(RWL)

Your Honor:

I am one of the attorneys representing defendants City of New York and Christopher Siani ("Defendants") in this matter. Defendants write to respectfully request that the Court issue an Order directing the Clerk of the Court to seal Docket Entries Nos. 100-10 and 121-8, with access limited to all parties and counsel in this action, and directing that any future filings incorporating confidential documents be made under seal. The parties have conferred and plaintiff's counsel consents to this request.¹

I. Defendants' Position

On December 5, 2022, plaintiff's counsel filed a motion purporting to seek sanctions against defendants and defense counsel. (See, ECF No. 100). Defendants wrote in response to that motion the same day. (See, ECF No. 101). On December 20, 2022, due to a filing error, plaintiff re-filed this motion. (See ECF Nos. 119-121). Plaintiff's motion relied upon documents disclosed in discovery which were produced subject to a protective order entered by the Court and were marked confidential. (See ECF Nos. 100-10 and 121-8). Defendants have not consented to have these documents de-designated, nor did plaintiff seek leave of Court to file them on the public docket. Accordingly, defendants are respectfully requesting that the Court

¹ This conferral took place by email on December 21 and 22, 2022, as plaintiff's counsel was unavailable for a telephone call.

enter an Order sealing these docket entries (ECF Nos. 100-10 and 121-8), and directing that any future filings incorporating confidential documents be made under seal.

II. Plaintiff's Position

It is Plaintiff's position that the documents included are not confidential and that the filing of said documents was within the parameters of the Court's instruction that the documents be used for this action only. However, Plaintiff consents to the sealing of the docket numbers specified, and to make any future filings incorporating confidential materials under seal, to avoid further unnecessary litigation of this issue.

Defendants thank the Court for its consideration herein.

Respectfully submitted,



/s/

Hannah V. Faddis
Senior Counsel
Special Federal Litigation Division

cc: **VIA ECF**
All Counsel of Record